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August 22, 2018

VIA ECF

Hon. Gregory H. Woods
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: Tuckett v. Slade Industries, Inc. and Slade Elevator, Inc.
Docket No.: 16-cv-04081 (GHW)

Dear Judge Woods:

After conferring with plaintiff's counsel, and in accordance with the Court's August 17, 2018 Order, we hereby submit this joint letter advising as to the parties' availability for trial in March, April and May of 2019. The parties anticipate that the trial will take approximately two weeks and are available April 15-18, and the weeks of April 29, May 6, and May 13, 2019.

The parties are scheduled to appear for a continued Settlement Conference before Magistrate Judge Sarah Netburn on October 11, 2018 at 2:00 p.m.

We are jointly requesting an extension of the deadline for the pre-trial documents required by Rule 5 of the Court's Individual Rules ("Rule 5 Documents"). This deadline was set in accordance with Paragraph 10 of the Civil Case Management Plan and Scheduling Order entered on July 5, 2016. As the Court decided defendants' Motion for Summary Judgment on August 14, 2018, the Rule 5 Documents are currently due by September 5, 2018.

The parties jointly seek this extension to allow an opportunity to mediate the case in good faith and attempt a resolution. To that end, the parties are seeking to utilize their limited resources towards settlement, rather than spend additional time and money preparing the Rule 5 Documents. The parties propose that, should settlement not be achieved by the date of the conference, the deadline for the Rule 5 Documents shall be extended to 21 days thereafter. The trial date should not be affected.

There has been no prior request for an extension related to the Rule 5 Documents.

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We thank the Court for its consideration.

Respectfully submitted,

CONNELL FOLELY LLP
Attorney for Defendants



Perri J. Koll

cc: David Tolchin, Esq. (via ECF)